

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Suits Against the Saint Thomas Entities

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

**JOINT STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSE TO PSC'S
MOTION TO COMPEL RESPONSES TO CERTAIN INTERROGATORIES**

On November 19, 2014, the Plaintiffs’ Steering Committee (“PSC”) moved this Court for an order compelling the Saint Thomas Entities to respond to certain interrogatories. *See* Dkt. No. 1549 (the “Motion”). Pursuant to the Court’s MDL Order No. 11 (Dkt. No. 1524), the impacted parties, which consist of the PSC and Saint Thomas West Hospital f/k/a St. Thomas Hospital, Saint Thomas Health, and Saint Thomas Network (the “Saint Thomas Entities”), agree to extend the time for the Saint Thomas Entities to respond to the PSC’s Motion to Compel to **December 22, 2014**. The PSC had previously designated its Motion as up for hearing at the Court’s December 4 Status Conference. Dkt. No. 1563. Given the stipulated extension herein, the PSC acknowledges that the Motion will not be ripe for hearing on December 4, 2014 and should be removed from the agenda.

Dated: November 28, 2014

Respectfully submitted,

/s/ Sarah P. Kelly

Sarah P. Kelly (BBO #664267)
skelly@nutter.com

NUTTER McCLENNEN & FISH LLP
Seaport West
155 Seaport Boulevard
Boston, Massachusetts 02210
(617) 439-2000
(617) 310-9461 (FAX)

Yvonne K. Puig*
Texas State Bar No. 16385400
yvonne.puig@nortonrosefulbright.com
Adam T. Schramek*
Texas State Bar No. 24033045
adam.schramek@nortonrosefulbright.com
Eric J. Hoffman*
Texas State Bar No. 24074427
eric.hoffman@nortonrosefulbright.com

FULBRIGHT & JAWORSKI LLP
98 San Jacinto Blvd., Suite 1100
Austin, Texas 78701
(512) 536-2450
(512) 536-4598 (FAX)

Marcy Hogan Greer*
Texas State Bar No. 08417650
mgreer@adjtlaw.com

ALEXANDER DUBOSE JEFFERSON &
TOWNSEND LLP
515 Congress, Suite 2350
Austin, Texas 78701
(512) 482-9300
(512) 482-9303

*Appearing Pro Hac Vice

Counsel for Saint Thomas Entities

/s/ Benjamin A. Gastel

J. Gerard Stranch, IV

Benjamin A. Gastel

BRANSTETTER, STRANCH & JENNINGS
PLLC

227 Second Avenue North

Nashville, TN 37201

Telephone: (615) 254-8801

Facsimile: (615) 255-5419

gerards@branstetterlaw.com

beng@branstetterlaw.com

*Plaintiffs' Steering Committee and Tennessee
State Chair*

CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 28th day of November, 2014.

/s/ Sarah Kelly

Sarah P. Kelly

2687275.1